

1 Sheri M. Thome, Esq.
2 Nevada Bar No. 008657
3 Jason R. Wigg, Esq.
4 Nevada Bar No. 007953
5 **WILSON, ELSER, MOSKOWITZ,
6 EDELMAN & DICKER LLP**
7 6689 Las Vegas Blvd. South, Suite 200
8 Las Vegas, Nevada 89119
9 Telephone: 702.727.1400
10 Facsimile: 702.727.1401
11 Email: Sheri.Thome@wilsonelser.com
12 Email: Jason.Wigg@wilsonelser.com
13 *Attorneys for Defendant DeRoyal Industries, Inc.*

14 **UNITED STATES DISTRICT COURT**

15 **DISTRICT OF NEVADA**

16 LINDA GOODHOPE;

17 Plaintiffs,

18 vs.

19 DERoyal INDUSTRIES, INC., a foreign
20 corporation; ROE MANUFACTURER; ROE
MAINTENANCE AND REPAIR; DOE
INDIVIDUALS 1-20 and ROE ENTITIES 1-
20;

21 Defendants.

22 Case No. 2:22-cv-02098-APG-DJA

23 **STIPULATION AND ORDER TO EXTEND
24 DISCOVERY DEADLINES
(Fourth Request)**

25 *As amended on pages 3 and 4*

26 Plaintiff Linda Goodhope (“Plaintiff”) and Defendant DeRoyal Industries, Inc. (“DeRoyal”),
27 by and through their undersigned counsel of record, hereby submit the following Stipulation to
28 Extend Discovery Deadlines. This is the fourth request to extend the deadlines in the scheduling
order (ECF Nos. 16, 21, 23 and 26).

29 **A. DISCOVERY COMPLETED TO DATE**

30 1. The Rule 26(f) conference was held on February 2, 2023.
31 2. Plaintiff served initial disclosures on February 8, 2023.
32 3. DeRoyal served initial disclosures and requests for production of documents and
33 interrogatories on Plaintiff on February 15, 2023.
34 4. Plaintiff timely served her written responses to the discovery requests on March 17,
35 2023.
36 5. First supplemental disclosures were served on March 17, 2023 by Plaintiff.

1 6. On April 11, 2023, DeRoyal requested Plaintiff's medical records from various
2 providers.

3 7. On March 28, 2023, Plaintiff served requests for admission, interrogatories, and
4 requests for production on DeRoyal. DeRoyal timely served its written responses to the discovery
5 requests on May 11, 2023.

6 8. DeRoyal served its first supplemental disclosures on May 12, 2023.

7 9. The deposition of UMC's Rule 30(b)(6) designees were taken via Zoom on June 12,
8 2023.

9 10. On June 13, 2023, third supplemental disclosures were served by DeRoyal and
10 Plaintiff served her second supplemental disclosures.

11 11. DeRoyal served its fourth supplemental disclosures on August 2, 2023.

12 12. Plaintiff's deposition was taken on August 7, 2023.

13 13. On August 8, 2023, DeRoyal served its fifth supplemental disclosures.

14 14. DeRoyal served its sixth supplemental disclosures on November 30, 2023.

15 15. On January 4, 2024, DeRoyal served its seventh supplemental disclosures.

16 16. Eighth supplemental disclosures were served by DeRoyal on January 9, 2024.

17 17. The parties served their initial designations of expert witnesses on January 31, 2024.

18 18. Plaintiff served her third supplemental disclosures on February 9, 2024.

19 19. Plaintiff took the depositions of DeRoyal's FRCP 30(b)(6) designees on February 15,
20 2024 and February 16, 2024.

21 20. DeRoyal served its designation of rebuttal expert witnesses on February 29, 2024.

22 21. On February 29, 2024, Plaintiff served her fourth supplemental disclosures and first
23 supplement to initial designation of expert witnesses.

24 **B. DISCOVERY THAT REMAINS TO BE COMPLETED**

25 The parties anticipate completing the following discovery:

26 1. Production of additional documents being obtained from Plaintiff's providers;
27 2. Potentially additional depositions of fact witnesses;
28 3. Depositions of Experts.

1 **C. REASONS WHY DEADLINE WAS NOT SATISFIED/GOOD CAUSE FOR**
 2 **REQUEST**

3 After the parties served their expert and rebuttal expert disclosures, they discussed and
 4 agreed to mediate this matter in hopes of resolution. It is expected to take 30-40 days to complete
 5 the mediation. If the parties do not settle, they would like 30 days to complete discovery. It is
 6 anticipated that all remaining discovery deadlines be extended for an additional seventy (70) days
 7 to allow time to schedule the mediation and then complete discovery if the mediation is
 8 unsuccessful.

9 The parties have submitted the instant stipulation and order 21 days before the current
 10 discovery cut-off date of March 29, 2024, which is within the time required by LR ~~26-4~~²⁶⁻³.

11 **D. PROPOSED DISCOVERY SCHEDULE**

12 Pursuant to LR 26-3, the parties propose to extend the current deadlines and jointly submit
 13 the following to the Court:

14 1. **Discovery Cut-Off Date:** The current discovery cut-off date is March 29, 2024. The
 15 parties are requesting a seventy-day extension of this deadline up to and including **June 7, 2024**.

16 2. **Deadline for Amending Pleadings or Adding Parties:** The current deadline was
 17 September 5, 2023. The parties are not requesting an extension of this deadline.

18 3. **FRCP Rule 26(a)(2) Disclosures:** The current deadline was January 31, 2024, for
 19 initial expert disclosures and February 29, 2024, for rebuttal expert disclosures. The parties are not
 20 requesting an extension of these deadlines.

21 4. **Dispositive Motions:** The current deadline for filing dispositive motions is April 29,
 22 2024. The parties request a seventy-day extension of this deadline up to and including **July 9, 2024**.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 5. **Pre-Trial Order:** The current deadline to file the Joint Pretrial Order is May 27,
2 2024, unless otherwise suspended under LR 26-1(b)(5). The parties request that the Pre-Trial Order
3 be due **August 8, 2024 or, if dispositive motions are filed, 30 days after decision on the**
4 **dispositive motions or further court order.**

4 **IT IS SO STIPULATED.**

5 DATED this 7th day of March, 2024.

5 DATED this 7th day of March, 2024.

6 WILSON, ELSER, MOSKOWITZ, EDELMAN
7 & DICKER LLP

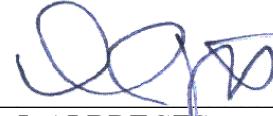
6 RICHARD HARRIS LAW FIRM

8 By: /s/ Jason R. Wigg
9 Sheri M. Thome, Esq.
10 Nevada Bar No. 008657
11 Jason R. Wigg, Esq.
12 Nevada Bar No. 007953
13 6689 Las Vegas Blvd. South, Suite 200
14 Las Vegas, Nevada 89119
15 Phone: 702-727-1400
16 Sheri.Thome@wilsonelser.com
17 Jason.Wigg@wilsonelser.com
18 *Attorneys for Defendant*
19 *DeRoyal Industries, Inc.*

8 By: /s/ Johnathan M. Leavitt
9 Johnathan M. Leavitt, Esq.
10 Nevada Bar No. 013172
11 6900 S. McCarran Blvd., #1010
12 Reno NV 89509
13 Phone: (775) 222-2222
14 jleavitt@richardharrislaw.com
15 *Attorneys for Plaintiff*
16 *Linda Goodhope*

14 **ORDER**

15 GOOD CAUSE SHOWN, IT IS SO ORDERED.



16 _____
17 DANIEL J. ALBREGTS
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: March 8, 2024